

RESPONSE TO JL INVESTIGATION REPORT

No	Recommendation	Accepted /Partially accepted/ not accepted	Response	Target date for completion	Progress (to be updated after 6 months)
1	<p>It is noted that the Internal Investigation, 2002, recommended attendance by the Chaplaincy at F2052SH (now ACCT – Assessment, Care in Custody and Teamwork) reviews both locally and nationally, and this recommendation is supported. In cases where drug abuse is involved a CARATS representative should also attend, and Education staff should be invited to attend or make a contribution to the review, where prisoners are attending education classes.</p>	Accepted in principle	<p>Between 2000-07 HMPS conducted a wide ranging review of its suicide prevention and self harm management procedures. Feltham was identified as a high risk establishment and benefited from additional investment in support of its suicide prevention and self harm management strategy. The National Review resulted in the development of a new system of individualised, care planning for at risk prisoners. In 2004, this new system, Assessment, Care in Custody and Teamwork, (ACCT), was piloted at a number of establishments, including Feltham, prior to national roll out between 2005-08.</p> <p>ACCT introduced a multi-disciplinary case management approach to supporting prisoners identified at risk of suicide or self harm. ACCT</p>		

			<p>differs from the F2502SH in its overall approach to prisoners. It focuses on an individual assessment, uses accountable case managers and assessors, encourages flexible care, and sets up clear systems to deal with post-closure and post-release care.</p> <p>Since JL's attempted suicide, the management of at risk prisoners has fundamentally changed. The case review must include the key people involved in the prisoner's care. This includes non residential staff who may also be in contact with the prisoner/trainee, such as the Chaplain, or CARATS staff where appropriate and relevant to the individual's care. Where attendance in person at the review is not possible, written or verbal reports can be submitted for consideration.</p> <p>A key element of the ACCT process is the involvement of the prisoner and it is expected that they are present at their case reviews and are consulted about their care.</p>		
2	The CARATS teams should record information about their interviews with prisoners in unit history sheets, and	Accepted in	Clear guidelines are provided for all CARAT workers in the	This process is already in place	

	share assessments with staff who are managing prisoners, particularly when an ACCT (formerly F2052SH) process has been opened. These records should be available when required for any future investigations.	principle	CARATs Practice Manual, which should be adhered to ensuring good practice exists in managing a client who is on an ACCT. The relevant information can be found in Section 6 heading 6.5 Management of Risk of Harm . All CARAT workers are required to attend ACCT training and attend ACCT case reviews where they have case management responsibility for an offender.	and has been since the publication of the CARAT Practice Manual in 2004 and the revised version in July 2009.	
3	A specialist service should be available to address the underlying social problems associated with risk of self-harm, where needed, for prisoners identified under ACCT (formerly F2052SH).	Accepted in principle	<p>The prison population contains a high proportion of very vulnerable individuals, many of whom have experienced negative life events that we know increase the likelihood of them harming themselves. Issues that increase risk include drug/alcohol abuse, family background and relationship problems, social disadvantage or isolation, previous sexual or physical abuse, and mental health problems.</p> <p>Reasons leading a person to self harm are complex and multi-faceted and a single service is unlikely to meet the needs of individuals. The NOMS Resettlement Strategy provides support to prisoners across several resettlement</p>		

			<p>pathways to tackle social health factors affecting prisoners including:</p> <ul style="list-style-type: none"> Attitudes, Thinking & Behaviour Substance Misuse Education and Training Employment Accommodation Health and Mental Health Children and Families <p>Care and support provided through the pathways takes into account the individual's needs and allows a holistic approach to tackling the underlying causes of self harming behaviour. This is in line with PSO 2700 Suicide Prevention & Self Harm Management, (reissued 2007).</p> <p>In addition NICE guidance on the management of self harm sets out appropriate management and interventions for use with those who self harm. PCTs are responsible for ensuring appropriate clinical interventions are provided to prisoners, including psychological support where appropriate.</p>		
4	Where prisoners can be shown through review to have	Accepted	Knowledge of suicidal and self		

	<p>become dependent on the added support the ACCT process provides, consideration should be given to withdrawing the process more gradually as part of the closure plan.</p>	<p>in principle</p>	<p>harming behaviour has developed since JL's attempted suicide in 2002.</p> <p>Individualised case management is at the heart of the current NOMS strategy. The current strategy, introduced in 2007, aimed to reduce the risks associated with the withdrawal of support, by introducing requirements for post closure reviews and highlighting the need for gradual withdrawal of support where appropriate.</p> <p>As well as addressing the individuals concerns the case management approach requires staff to encourage the person-at-risk to build up their own support networks and coping strategies over the course of the reviews. This allows the individual to create replacement social support networks alongside the ACCT support.</p> <p>All prisoners subject to ACCT management must have at least one post closure review to discuss their progress, whether further actions are required and where necessary to re-open the ACCT document.</p>		
--	--	---------------------	--	--	--

5	Methods of translating Formal Policy Documents into accessible and simplified instructions for Prison Officers using skills-based training methods should be developed.	Accepted in principle	<p>The NOMS has in place ways to disseminate information to its staff.</p> <p>When new policy is issued, Governors will determine at a local level how the information should be disseminated to staff. This may be by way of local training, a local policy document, staff meetings and briefings, a Governor's Order or a Governor's Notice to Staff.</p> <p>In addition all new prison officers undergo formal training which incorporates the delivery of key policies, including suicide prevention and self-harm management. A requirement of PSO 2700 is for uniformed and non-uniformed staff in contact with prisoners to undertake ACCT foundation level training.</p>		
6	Archived records in accordance with PSO 9020 should be more clearly indexed to facilitate future investigations.	Accepted in principle	<p>The NOMS accepts that the investigation experienced difficulties retrieving some of JL's records for various reasons.</p> <p>In August 2009 the NOMS issued Prison Service Order 9025 HMPS Archiving, Retention & Disposal policy which sets out instructions for</p>		

		<p>the management of paper and electronic based information for NOMS. PSO 9025 supersedes Chapter Five of PSO 9020 – The Data Protection Act 1998 and the Freedom of Information Act 2000.</p> <p>PSO 9025 requires Governing Governors, Directors of Offender Management (DOMS) and Heads of Group to assign a Local Information Manager (LIM), and a deputy, whose role is to ensure that effective archiving and retention of records take place. The LIM will be responsible for a destruction log which must be completed when destroying records.</p> <p>There is also a requirement that Governing Governors, DOMS and Heads of Group must submit an annual compliance statement as to how they will ensure effective management with their establishment and HQ group.</p> <p>These procedures should ensure that prison records are held in way that will ensure quicker access to archived records in the future.</p>		
--	--	---	--	--

